Dear Chairman Genachowski and Commissioners Copps, McDowell, Clyburn, and Baker, ADA Officials,

I work for a VRS provider but do not represent the company for official policy regarding interpreting, I am not an interpreter or part of interpreting management.

In working with my deaf employees, I understand an interpreter training problem that needs to be addressed as part of the allowable VRS rates across all tiers and requires ADA clarification.

Interpreters are not getting the proper training to be effective with Deaf users of VRS.  The training problem is based on the following observations and is common across all VRS providers:

I have several deaf people that I work with.  They are users of VRS and I asked them specifically, "Do you ever get interpreters through VRS that do not understand your ASL?, They said that 20-30% of all calls they do through VRS, are connected to interpreters who don't either understand them or can't communicate what they are trying to say effectively.  I asked them why. They said that it?s the difference between ASL dialects or jargon that causes the problem for them.

Example 1 - From what they are explaining to me, different parts of the country have different signs and because there is a national pool of interpreters, sometimes they get one from Boston, MA when they are from SLC, UT.  This presents problems with the conversation for inexperienced interpreters who don't know the difference between SLC and Boston ASL.

Example 2 - A technical call where technical terms are being used by the VRS user.  The interpreter may not understand technology terms and not be able to communicate effectively for the VRS user to a hearing person.  From what my employees are explaining to me, experience and knowledge with medical, legal, professional, religious, low functioning deaf, special needs and other special areas affect how well an interpreter performs their interpreting.

These ASL impediments are like "STATIC" on a telephone line to them where the conversation is not efficient and many things need to be clarified or repeated.  Sometimes the interpreter goes on and the Deaf person does not know how bad the interpretation was, even up to misrepresenting the conversation.

My employees emphasized, this is not the fault of the interpreter for neglect.  It is a lack of experience and training.  Highly experienced interpreters cost more and are in short supply; especially those who have been in the business for a long time and know how to work with this noise (if you will). Other interpreters are newer and are missing components of ASL dialects, nuances and jargon from lack of experience and training.  It must be recognized that because VRS demands so many interpreters, it

requires the VRS service to hire entry level interpreters.  To avoid having to take 10 years to learn on their own interpreters need training to improve their ASL skills.  This will shorten the learning curve.

This "ASL Static" affects 20-30% of the calls that my Deaf employees are telling me they make.  They handle the less effective calls mostly by hanging up and calling back in over and over again until they get an interpreter who can handle their call properly.  They rarely complain to a VRS provider or the FCC because they can't blame an interpreter who is trying so hard to help them and because they want to be nice and are grateful for the service they have.

This explains why my employees tell to me about it and not go to the official channels to complain.  My employee?s attitude is, ?that?s just the way it is and there is nothing that can be done about it?.

The complaints I viewed on the FCC about interpreting do not reflecting the scope of this problem with "ASL Static".  I can see why the FCC is questioning training program costs because their complaint data does not represent the real world VRS use completely.

"ASL Static" can significantly impact an important conversation, like a job interview over the VRS service.  It can interrupt the flow of a call and force a Deaf person to call back into the VRS service.

A personal experience that relates to this point is the following:
?I was interviewing a Deaf person on a panel interview in person.  We had an interpreter in the room, a hard of hearing person (hiring manager), the interviewee and I (hearing).  It was a technical interview and we proceeded to question the candidate rigorously about what they knew about home networks, PCs, Windows OS, desktops, videophones and etc.  The candidate struggled with the questions we asked and looked nervous.  I was thinking this person would not be able to do the job because they were not qualified.  After about 15 minutes, my interviewing partner stopped the meeting and said, ?Let?s take a break?.  After 15 minutes he returned with another interpreter.  We then started the meeting over again.  This time the answers the candidate gave were very good and then I saw the candidate that was really there.  He was more confident and was very qualified to do the job.

I asked my interviewing partner, ?Why did we change interpreters?? My interviewing partner explained that because his hearing loss was not in the hearing range where the interpreter was speaking and he could hear me; he could hear most of what was said by everyone and because he knew sign language used by both the interpreter and the candidate.  In essence, he saw and heard the whole conversation and knew the interpreter was struggling with the technical side of the interview.  He explained to me, ?This is a problem that Deaf people deal with every day trying to communicate.? This experience led me to ask the question, ?Do you ever get interpreters through VRS that do not understand your ASL?? to my other employees.?

We eventually, hired this Deaf person to work for us.  I wonder how many job interviews over VRS or in-person don?t have a happy ending.

It seems to me, that not addressing "ASL Static" via training would be directly affecting ADA rights of Deaf people's access to clear conversations through the telephone system.  It also seems to me that this problem can be reduced by training interpreters which would bring up the skills of each one which lowers the frequency of the problem.  I believe this goes to an ADA question of whether the VRS service, as it is now, functionally equivalent as well.  I don't have static on my telephone on 20-30% of my telephone calls, to the point of disrupting the conversation or forcing me to call someone back.

What can be done? In my opinion, the FCC should understand the ?ASL Static? problem explained here.  The FCC should fund a program to investigate from both interpreters and Deaf people using VRS to get their feedback from both sides.   This should be an outward reaching survey outside of the normal FCC complaint processes and outside of the VRS provider?s complaint reports.  The right questions need to be asked to clarify the problem before you can solve it.

Sorenson Communications has a training program for improving interpreters.  This type of program is the type of training needed to reduce the "ASL Static". Sorenson being the largest provider of services has experts who understand training requirements.  Other VRS providers have similar experts.  A core problem that the FCC can help with is the funding through the VRS rates.  My understanding is that training and training research like the VRS Institute is doing, it is NOT included in the allowable costs area of the VRS rates, thus not funded.  If the VRS Tier III rate gets cut, will Sorenson be able to continue to train or improve training without being paid for it?  I believe the costs of training needs to be spelled out and allowed on the FCC VRS rates to improve the quality of interpreters so they can reduce the "ASL Static" and to meet ADA requirements.  The FCC model of using incentives to develop the programs is the right approach.

Interpreting through videophones appears to be a new field of training that Sorenson is developing to address interpreter problems like ?ASL Static? for improvements to the quality of the communication.  Development is expensive at first until breakthroughs and efficiencies drive down the costs to provide it.  Given these training programs seem very expensive to administrate, house and deliver, the FCC should first investigate this problem, and upon verifying it, they should allow proper funds into the VRS rate across all tiers to develop the program for all VRS providers to increase the quality of interpreting.  In my opinion, the FCC should fund Sorenson's VRS Institute costs as a benchmark for this type of interpreter development and they should also incent other VRS providers to develop training programs.  This training program alone could justify leaving the VRS rate on all Tiers where it is or even justify an increase to it.  This training is a bigger problem that no one else seems to be talking about.

I see a need for the FCC fund to the work to do: manpower, innovation and technology. I see this as supported on an ADA mandate from the federal government to do "improvements in technology and efficiency". I believe this high rate of "ASL Static" to be unacceptable to the Deaf using the VRS service because it is not efficient communications. Deaf are just too nice to complain about it. I also see grounds from the ADA functional equivalence for a clear conversation.

If the FCC adopts the lower VRS rates, especially on tier III now proposed, I fear that the ?ASL Static? problem will increase because VRS providers will be forced to discontinue their fledgling training programs. The consequence of this would be going backward, not forward.

Both in-person and VRS interpreters are an extremely important resource for the Deaf. I use them very often and appreciate them. They need support with adequate training to help them be the best they can be.

Thank you for your audience.